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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

FRANK HALL, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

JOHNSON & JOHNSON, ALEX  
GORSKY, DOMINIC CARUSO,  
SANDRA PETERSON, CAROL  
GOODRICH, JOAN CASALVIERI,  
PH.D., MICHAEL SNEED, and  
TARA GLASGOW,

Defendants.

Civil Action No.  
3:18-cv-01833-FLW-TJB

Hon. Freda L. Wolfson

Document Electronically Filed

**RETURN DATE: AUGUST 19, 2019**

**NOTICE OF MOTION  
TO DISMISS THE  
FIRST AMENDED CLASS  
ACTION COMPLAINT**

[ORAL ARGUMENT REQUESTED]

**TO: All Counsel of Record**

**PLEASE TAKE NOTICE** that on August 19, 2019 at 10:00 a.m., or on such other date as set by the Court, Defendants Johnson & Johnson, Alex Gorsky, Dominic Caruso, Sandra Peterson, Carol Goodrich, Joan Casalvieri, Michael Sneed, and Tara Glasgow (collectively, “Defendants”) shall move before this Court for an

order and judgment, pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing Plaintiffs' First Amended Complaint with prejudice for failure to state a claim upon which relief can be granted; and for such other and further relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that Defendants intend to rely upon the accompanying Request for Judicial Notice; the accompanying Memorandum of Law; the accompanying proposed Form of Order; the accompanying Certificate of Service; and the pleadings and prior proceedings herein in support of this motion.

**PLEASE TAKE FURTHER NOTICE** that oral argument is hereby requested.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Order entered on December 12, 2018, your opposition, if any, must be electronically filed and served upon all parties by July 2, 2019.

**PLEASE TAKE FURTHER NOTICE** that a Proposed Order is attached.

Dated: May 3, 2019

Respectfully submitted,

/s/ Jack N. Frost, Jr.

Jack N. Frost, Jr.

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